

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, DC 20554**

In the Matter of	)	
	)	
Amendment of Part 2 of the Commission's Rules	)	
to Allocate Spectrum Below 3 GHz for Mobile	)	ET Docket No. 00-258
and Fixed Services to Support the Introduction of	)	
New Advanced Wireless Services, Including Third	)	
Generation Wireless Systems	)	
	)	
Amendment of Section 2.106 of the Commission's	)	
Rules to Allocate Spectrum at 2 GHz for Use	)	ET Docket No. 95-18
by the Mobile-Satellite Service	)	
	)	
The Establishment of Policies and Service Rules	)	IB Docket No. 99-81
for the Mobile-Satellite Service in the 2 GHz Band	)	
	)	
Flexibility for Delivery of Communications by	)	
Mobile Satellite Service Providers in the 2 GHz	)	IB Docket No. 01-185
Band, the L-Band, and the 1.6/2.4 GHz Band	)	
	)	
To: The Commission	)	

**REPLY COMMENTS OF MEREDITH CORPORATION**

Meredith Corporation ("Meredith"), by its attorneys and pursuant to Section 1.415 of the Commission's Rules, herewith submits its Reply Comments in the above-captioned proceedings.

Meredith is one of America's leading media and marketing companies. It operates businesses centered on television broadcasting, magazines and book publishing, and interactive and integrated marketing. Meredith has been a broadcaster since 1948. Today it owns twelve television stations reaching approximately 10% of all television households, comprised of five CBS affiliates, one NBC affiliate, and six FOX affiliates.<sup>1</sup>

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<sup>1</sup> The stations are WGCL, Atlanta, GA; KPHO, Phoenix, AZ; WOFL, Orlando, FL; KPDX, Portland, OR; WFSB, Hartford, CT; WSMV, Nashville, TN; KCTV, Kansas City, MO; WHNS, Asheville, N.C.; KVVU, Henderson (Las Vegas), NV; WNEM, Bay City (Flint), MI; WOGX, Ocala, FL; and KFXO-CA, Bend, OR.

Meredith is a user of the seven 2 GHz channels in the Broadcast Auxiliary Services. Meredith uses BAS facilities for Electronic News Gathering (ENG), for special events coverage, for studio-transmitter links (STLs), and intercity relays (ICRs). Meredith has a vital interest in the subject matters of the captioned proceedings, and the future of allotments for Broadcast Auxiliary Services.

Meredith supports the positions expressed in the Comments of the Society of Broadcast Engineers, Inc. (“SBE”), filed October 19, 2001<sup>2</sup>, and in the Joint Comments of The Association for Maximum Service Television, Inc. (“MST”), and The National Association of Broadcasters (“NAB”), filed October 22, 2001. The record in these proceedings establishes the necessity for the Commission to reconsider the current BAS relocation plan, and it compels the conclusion that the Commission should adopt a revised plan – one that minimizes the disruption of incumbent services.

It is indisputable that the entire basis for the current BAS relocation plan – a phased relocation as MSS spectrum demand warrants – will no longer exist if the upper end of the 2 GHz MSS band is reallocated for wireless use. The record is clear that potential demand from advanced wireless services entities is greater now than the single MSS entrant that was evident when the current relocation plan was adopted. Further, many of the new wireless entrants will be in a stronger economic position to absorb BAS relocation costs out of existing operating revenues, rather than from investment capital. Accordingly, Meredith concurs with the views of MST and NAB that there is no longer a basis to burden BAS incumbents with a phased relocation plan. As SBE observes, there should be an immediate jump to Phase II of the 2-step plan, by reallocation to the 2025-2110 MHz band.

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<sup>2</sup> SBE filed two sets of Comments, one of which addresses below 3 GHz spectrum for 3G wireless, and the other of which addresses the addition of a terrestrial component to MSS.

Meredith observes as equally cogent the fact that the existing reallocation plan is now unworkable. It does not comport with the rapid deployment of advanced wireless services in the upper portion of the 1990-2025 MHz band. Meredith subscribes to the view that BAS relocation should be accomplished in a single phase, to the new 12 MHz channel plan. Meredith believes the positions of MST, NAB, and SBE are salutary, to (1) stay negotiations with MSS entrants; (2) relocate all BAS incumbents, in all markets, at one time; and (3) eliminate, extend, or restart the current September 2010 sunset date.

As the MST/NAB Joint Comments postulate, *Emerging Technologies* principles govern the relocation of BAS incumbents in the 1990-2025 MHz band. A one-stage relocation will require BAS incumbents' relocation expenses to be paid up front, prior to any retrofitting, retuning, or equipment replacement, and prior to any cessation in spectrum usage. Whichever group is the first to occupy the 1990-2025 MHz band, whether advanced wireless operators or MSS operators, should initially bear the cost of relocating all BAS licensees to 2025-2110 MHz. In this connection, Meredith believes that there should be collective, coordinated negotiation between BAS incumbents and new entrants on whether to surrender BAS channel 1 during Phase I, or to be relocated to seven smaller channels. Meredith agrees with MST/NAB that efficient and expedited relocation will require negotiated coordination.

Meredith subscribes to the view that any terrestrial use of MSS spectrum must be truly ancillary to the primary satellite service. Further, it must not interfere with incumbent services in adjacent spectrum. We urge the Commission to adopt its proposed requirement that no MSS operator be permitted to offer terrestrial service until it can provide satellite service covering 100% of the United States, 100% of the time. Meredith agrees with MST and NAB that the Commission's proposal to allow terrestrial use of MSS spectrum by "any entity" providing

mobile services, whether in conjunction with or independent of an MSS operator, would involve new services and new entrants. Therefore any such proposal should be considered in accordance with the reallocation principles previously discussed.

In conclusion, any reallocation of MSS spectrum for advanced wireless uses will require changes in the current 2-phase, market-staggered BAS relocation plan. Any such plan should relocate all BAS incumbents in all markets together. It should ensure prompt and full compensation of BAS incumbents prior to relocation. It should eliminate or extend the sunset date for compensation of displaced incumbents.

Respectfully submitted,

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November 8, 2001

## CERTIFICATE OF SERVICE

I, Amy L. Bowling, a secretary in the law offices of Garvey, Schubert & Barer, hereby certify that I have on this 8th day of November, 2001, sent a copy of the enclosed **“REPLY COMMENTS OF MEREDITH CORPORATION”** by hand-delivery, facsimile, or first-class, United States mail, postage prepaid to the following:

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